

From: brynucha@earthlink.net  
Sent: Monday, June 12, 2006 10:35 PM  
To: NOP Livestock  
Subject: Re: Docket TM-05-14

Mark Bradley, Associate Deputy Administrator, National Organic Program

1400 Independence Ave., SW.,

Room 4008-So., Ag Stop 0268

Washington, DC 20250

Mr. Bradley,

My family and I milk about 170 dairy cows(200 including dries) in southeastern Idaho. Since 1992 our milking cows, dry cows and replacements heifers have been rotationally grazed on approximately 300 acres of pasture. In a typical year we are able to graze our milking herd from mid-April through the first part of November. Other than about a two week transition at the beginning and ending of the pasture season when we feed some dry hay, our cows receive 100% of their forage from the pastures during the growing season.

Before we started pasturing our cows in 1992, our cows were confined in a freestall facility year round. Our cows are healthier and live much longer than our cows did in confinement.

We believe there is enough of an advantage for our cows, that we take some extra measures to let them access pasture for as much of their lives as we can. For example, during the growing season, we milk cows in two separate milk barns so we can have enough pasture for every cow for the entire season. This is inefficient from a labor and facility standpoint, but the benefit to the cows makes it worth it for us.

Also, our cows/acre ratio is intentionally designed so that all of our cows are able to meet their forage needs during the slowest grass growing times of the year. We harvest excess grass during the other times. This allows us to have the cows on the grass for more days each year.

We definitely believe our area of the country is a great place to pasture cows, even though large confinement operations are multiplying rapidly. We also believe that the confusion and lack of clarity about access to pasture had a big opportunity cost to our family dairy. Only recently were we able to secure a market for organic milk from our dairy after seeking a market for several years. Lacking the capital to create our own market, we were patient, but often frustrated hearing about growing demand for organic milk being filled in part by some cows without real access to pasture. We believe that

specific requirements for pasturing organic dairy cows may prevent this situation from happening to others.

We think that it is to bad that there has to be discussion about minimum requirements for organic cows on pasture. Pasture should be a foundation for organic production.

David and Kayla Roberts  
Preston, Idaho